

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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EASTERN DIVISION

CIVIL ACTION NO.: 04-11126-MLW 1:40

SANDRA YOUNG, and
ERIC K. SOUZA, P.P.A., By His MOTHER
AND NEXT BEST FRIEND,
Plaintiffs,

v.

SIX FLAGS, INC. and
INTAMIN AG.,
Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

**JOINT MOTION OF THE PARTIES TO EXTEND TRACKING DEADLINES AND
CONTINUE STATUS CONFERENCE**

Plaintiffs Sandra Young and Eric K. Souza, Defendant Six Flags, Inc., and Defendant Intamin Ltd. hereby respectfully move to modify their Joint Statement to extend all tracking deadlines by one hundred twenty (120) days. As grounds for this motion, the parties to this matter state as follows:

1. This is a personal injury lawsuit which arises from an incident involving the alleged collision of two sets of rollercoaster cars.
2. On December 23, 2004, this Court adopted the Joint Statement of the Parties, which set forth tracking deadlines for discovery and pre-trial events in this case.
3. The parties have been working cooperatively through the discovery process. Certain discovery requests have been responded to, and the deposition of Plaintiff Sandra Young

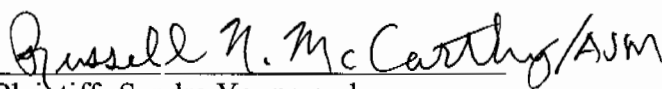
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was suspended, but to resume after receipt by defendants of additional medical and Social Security records.

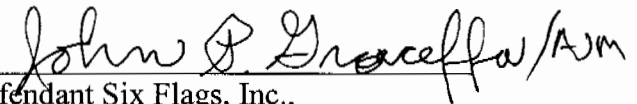
4. There has been some delay in obtaining the additional records, however, the parties have agreed to complete the deposition of Plaintiff Sandra Young upon receipt of such records. Other non-expert depositions have been scheduled as well.
5. The parties have additionally agreed to submit the case to mediation upon completion of the above-mentioned depositions.
6. The parties now seek additional time to complete the depositions and submit the case to mediation.
7. Plaintiffs Sandra Young and Eric K. Souza, Defendant Six Flags, Inc., and Defendant Intamin Ltd. respectfully request that this Court enter an order extending all tracking deadlines by one hundred twenty (120) days as set forth in the proposed Order.
8. The parties also respectfully request that the Status Conference, currently scheduled for June 7, 2005, at 10:00 a.m., be continued for one hundred twenty (120) days, or by whatever time is convenient for the Court.

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WHEREFORE, Plaintiffs Sandra Young and Eric K. Souza, Defendant Six Flags, Inc., and Defendant Intamin Ltd. respectfully request that this Court allow this limited extension and enter the proposed order attached as Exhibit "A," and continue the Status Conference.

/ASM

Plaintiffs Sandra Young and
Eric K. Souza,
By their attorney,
Russell N. McCarthy, #552879
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Fall River, MA 02720
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/ASM

Defendant Six Flags, Inc.,
By its attorneys,
John P. Graceffa, #205920
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250 Summer Street
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Defendant Intamin Ltd.,
By its attorneys,
Peter M. Durney #139260
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75 Federal Street
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CERTIFICATE OF SERVICE

I, Anthony J. Manhart, attorney for the third party defendant, Intamin Ltd., hereby certify that on the 1st day of June, 2005, a true copy of the foregoing Joint Motion of the Parties to Extend Tracking Deadlines and Continue Status Conference was served by mail, postage prepaid, directed to:

Russell N. McCarthy, Esq.
150 North Main Street
Fall River, MA 02720

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John P. Graceffa, Esq.
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210



Anthony J. Manhart